

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: VICTOR M. SOSA	:	CHAPTER 13
Debtor	:	CASE NO. 18-16251
_____	:	

**OBJECTION OF ONEMAIN FINANCIAL GROUP, LLC AS
SERVICER FOR ONEMAIN FINANCIAL ISSUANCE TRUST 2017-1
TO DEBTORS' CHAPTER 13 PLAN**

OneMain Financial Group, LLC as servicer for OneMain Financial Issuance Trust 2017-1 ("OneMain"), by its counsel, hereby objects to the confirmation of the Debtors' Plan for the following reason(s):

1. OneMain is a secured creditor of the Debtor, having timely filed a Proof of Claim. A true and correct copy of the Proof of Claim is attached hereto as Exhibit "A". A true and correct copy of the Loan Agreement executed by the Debtor (the "Note") is attached hereto as Exhibit "B".
2. OneMain has a lien on a 2007 BMW 3 Series (the "Vehicle") owned by the Debtor.
3. The amount of OneMain's claim is \$10,918.14.
4. The Debtor's Plan does not acknowledge the Note or Vehicle and makes no mention of OneMain whatsoever.
5. OneMain objects to Debtors' Plan because the Plan does not reference the secured claim of OneMain and makes no provision for payment to OneMain with respect to the above Vehicle.

WHEREFORE, OneMain alleges and avers that Debtor's plan is nonconfirmable and therefore prays that this Honorable Court will:

- a. Deny confirmation of the Debtors' plan.
- b. Dismiss or convert Debtors' case.

c. Provide such other relief as is equitable and just.

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

Dated: November 21, 2018

By: /s/ Peter E. Meltzer
PETER E. MELTZER, ESQUIRE